

Federal Communications Commission

WASHINGTON, D.C.

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
 )  
Amendment of Section 73.606(b) ) MM Docket No. 00-\_\_\_\_  
Table of Allotments )  
Analog Television Broadcast Station ) RM-\_\_\_\_  
(Gainesville, Florida) )

To: Chief, Video Services Division

**PETITION FOR RECONSIDERATION**

Gainesville Channel 61 Associates, LLC ("GCA"), applicant for a new NTSC television station on Channel 61, Gainesville, Florida,<sup>1</sup> by its counsel and pursuant to Section 1.106 of the Commission's Rules hereby petitions for reconsideration of the Commission's dismissal of GCA's above-captioned Petition for Rulemaking. By letter dated October 30, 2001, the Commission dismissed GCA's Petition for Rulemaking based on alleged interference and spacing violation problems with regard to several low power and Class A stations in the Gainesville area.<sup>2</sup> As set forth herein, by a very slight change in the technical proposal contained in GCA's Petition, the Commission's concerns can all be addressed. Given that the LPTV and

<sup>1</sup> KB Prime Media LLC ("KB Prime") and Television Capital Corporation of Gainesville ("TCCG") each filed competing applications for a new NTSC facility on Channel 61 at Gainesville, Florida. Pursuant to a Settlement Agreement, KB Prime agreed to dismiss its application and join with TCCG to become 50% owners of GCA. The parties filed a Joint Request for Approval of Settlement Agreement with the Commission on January 30, 1998.

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Class A interference standards were unclear, these minor changes should now be accepted. As such, the Commission should reconsider its dismissal of GCA's Petition for Rulemaking and initiate the requested rulemaking proceeding.

## **BACKGROUND**

KB Prime Media LLC ("KB Prime") and Television Capital Corporation of Gainesville ("TCCG") each filed competing applications for a new NTSC facility on Channel 61 at Gainesville, Florida (see FCC File Nos. BPCT-19960920LI and BPCT-19960920WR, respectively). Pursuant to a Settlement Agreement between these competing applicants, KB Prime agreed to dismiss its application and join with TCCG to become 50% owners of a new company named Gainesville Channel 61 Associates, LLC, the petitioner herein. The parties filed a Joint Request seeking Commission approval of this Settlement Agreement on January 30, 1998. Subsequently, on November 22, 1999, the Commission opened a filing window permitting, among other things, applicants for new NTSC television stations on channels 60-69 to modify their proposals to specify a channel below 60.<sup>3</sup> On July 14, 2000, in response to that filing window, GCA filed the above-captioned Petition for Rulemaking seeking to substitute and allot NTSC Channel 29 for the earlier proposed NTSC Channel 61 at Gainesville, Florida. Subsequently, by letter dated October 30, 2001, the Commission dismissed GCA's Petition for Rulemaking, stating that it failed to afford the necessary protection to several LPTV and Class A television stations.

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Footnote continued from previous page

<sup>2</sup> Notice of this action occurred on October 30, 2001, therefore the instant Petition seeking reconsideration is timely filed within 30 days of that date.

<sup>3</sup> See Public Notice, DA 99-2605 (released November 22, 1999); Public Notice, DA 00-536 (released March 9, 2000)(extending the filing window until July 15, 2000).

## DISCUSSION

The Commission's letter dismissing GCA's Petition for Rulemaking states that the proposal fails to meet the interference requirements of Section 73.623(c).<sup>4</sup> At the time when the Petition for Rulemaking seeking to substitute and allot Channel 29 at Gainesville was filed, however, GCA's consideration of the interference potential towards Class A LPTV stations was based on the provisions of OET Bulletin No. 69. At that time, it was unclear what standard the Commission would use to determine interference protection to Class A television stations. It now appears, however, that the Commission will not permit the use of OET Bulletin No. 69 to demonstrate compliance with these interference requirements at the allotment stage. Instead, the Commission has decided to require interference protection based solely on contour overlap. This decision has never been announced in any public notice or similar general announcement. Because at the time GCA initially filed its Petition for Rulemaking the Commission did not make clear what interference standard would apply to review of pending petitions seeking modification of the NTSC Table of Allotments, GCA should be permitted to amend its Petition to correct the issues identified by the Commission and the Commission should reinstate GCA's Petition for Rulemaking, as amended.

The Commission has clarified that it will afford applications for new television stations protection from Class A stations if those applications have been cut-off without competing applications or if there is a proposed remaining applicant in a group of mutually-exclusive applications for which a settlement agreement was on file by November 22, 1999.<sup>5</sup> Although not specifically applicable to proposals at the allotment stage, the Commission's extension of

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<sup>4</sup> As Section 73.623(c) applies to DTV stations, GCA believes that the applicable rule section is 73.613.

protection to applicants for new television stations with a pending settlement agreement recognizes the importance of allowing these applicants to bring a new television service to their proposed service areas. The logic behind this policy is directly parallel to the instant situation, as KB Prime and TCCG filed a Joint Request for Approval of their Settlement Agreement on January 30, 1998 in order to resolve a mutually exclusive proceeding and quickly bring new service to the residents of the Gainesville area. Providing new service is in the public interest, especially as the problems detailed by the Commission can be solved by the slight modification identified in the attached engineering statement.

GCA has re-examined and revised its engineering proposal for a new NTSC station on Channel 29 based on the standard that the Commission will now require for interference protection showings at the allotment stage. Submitted herewith as Attachment 1 is an engineering amendment that modifies GCA's Petition for Rulemaking to substitute and allot NTSC Channel 29 at Gainesville, Florida. This engineering amendment, prepared on behalf of GCA by the engineering firm duTriel, Lundin, & Rackley, Inc., resolves all of the issues raised by the Commission in its October 30, 2001 letter by making a few minor adjustments to GCA's initial proposal. (See Attachment 1.) Specifically, the amended engineering proposes rotating the orientation of the proposed directional antenna pattern slightly and reducing the proposed effective radiated power (ERP) of the station to 3600 kilowatts. With these two minor adjustments, the proposed NTSC station on Channel 29 will provide the required protection to adjacent LPTV and Class A stations in the Gainesville area. Therefore, as demonstrated in the

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<sup>5</sup> See 47 C.F.R. § 73.613(a), note.

attached engineering statement, Channel 29 can be substituted for the current Channel 61 NTSC allotment at Gainesville in compliance with the FCC's rules regarding NTSC allotment changes.

The Commission should be lenient in processing long-pending applications for new NTSC television stations, such as GCA's, and any associated Petitions for Rulemakings. The parties herein have identified an acceptable channel for a new television station and have expended considerable time, money and effort over the past five years attempting to bring a new television service to Gainesville. In the instant situation, the Commission dismissed GCA's Petition for Rulemaking based on an unannounced change in Commission policy that occurred after GCA amended its Petition in July 2000. Fundamental fairness dictates that applicants such as GCA must be afforded an opportunity to amend their pending petitions and at least be given a chance to meet the new standard.

Indeed, in previous similar situations, the Commission has afforded pending applicants the opportunity to amend their pending applications to comply with a change in Commission rules or processing standards. Following the Commission's adoption of new rules in 1980 implementing a computerized contour overlap method for predicting interference among translators and low power television applications, the Commission afforded all pending applications a 90-day period during which they could file major or minor amendments to bring their applications into compliance with the newly adopted technical and engineering standards.<sup>6</sup> In the instant case, the Commission should be even more lenient in permitting applicants to

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<sup>6</sup> Low Power Television Report and Order, 51 RR 2d 476 (1980), at ¶ 56; Public Notice 51 RR 2d 1275 (1982). *See also* Las Manzanitas Television Company, 99 FCC 2d 1241 (1985) (discussing the Commission's grant of a full opportunity for all applicants to amend their pending applications for LPTV stations or modifications in order to comply with newly imposed contour overlap standard and to attempt to remove any conflicts with existing stations).


amend their rulemaking proposals, as the interference identified by the Commission in this case is the result of an unannounced change in policy. Therefore, the parties were unaware of the standard and had no opportunity to ever comply with the rule. Furthermore, the issues raised by the Commission are very minor and can be resolved by a simple modification of the technical proposal.

### **CONCLUSION**

For the reasons stated above, the Commission should reinstate GCA's Petition for Rulemaking, as amended, and initiate the requested rulemaking proceeding to substitute and allot NTSC Channel 29 for Channel 61 at Gainesville, Florida.

Respectfully submitted,

**GAINESVILLE CHANNEL 61 ASSOCIATES, LLC**

By:   
David D. Oxenford  
Brendan Holland

Its Attorneys

Shaw Pittman LLP  
2300 N Street, NW  
Washington, DC 20037  
(202) 663-8000

Date: November 29, 2001

**ATTACHMENT 1**

TECHNICAL EXHIBIT  
PREPARED IN SUPPORT OF A  
PETITION FOR RECONSIDERATION  
TO MODIFY THE NTSC ALLOTMENT TABLE  
FACILITY ID: 127340  
CHANNEL 29  
GAINESVILLE, FLORIDA

Technical Narrative

This technical narrative and associated exhibits have been prepared on behalf of Gainesville Channel 61 Associates, LLC, (GCA) in support of a *Petition for Reconsideration* of the FCC's dismissal of the GCA proposal to modify the NTSC allotment at Gainesville, Florida by the proposed substitution of channel 29 for channel 61.

GCA filed a *Petition for Rulemaking* (FCC File No. BPRM-20000717ACS, Facility ID: 127340) to substitute channel 29 for the channel 61 NTSC allotment at Gainesville. The Federal Communications Commission (FCC) recently issued a letter<sup>1</sup> dismissing the channel 29 *Petition for Rulemaking*, stating the proposal failed to meet the interference requirements of Section 73.623(c)<sup>2</sup> of the Commission's Rules with respect to Class A stations WYPN-CA in Gainesville, Florida, WMVJ-LP in Melbourne, Florida and WRCF-LP in Orlando, Florida. In addition, the letter stated the proposal was also short-spaced to Class A station WBXG-LP in Gainesville, Florida. This *Petition for Reconsideration* was prepared to address each of the Class A

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<sup>1</sup> Letter dated October 30, 2001 from Clay C. Pendarvis, Chief, Television Branch, Video Services Division, Mass Media Bureau (RE: 2-A842).

<sup>2</sup> Section 73.623(c) applies to DTV stations. Therefore, it is believed that the applicable Section should be 73.613.



issues and modify the proposal to permit compliance with the Commission's interference criteria.

Specifically, it is proposed to operate from the same site location and antenna center of radiation above mean sea level and reduce the maximum directional ERP to 3600 kilowatts and reorient the proposed Andrew "cardioid" type directional antenna. By reducing the proposed ERP and reorienting the antenna, the proposal will eliminate prohibited contour overlap with respect to Class A stations WMVJ-LP and WRCF-LP. These two stations along with WYPN-CA and WBXG-LP are addressed below.

WYPN-CA, Gainesville, FL

According to the FCC's CDBS, Class A station WYPN-CA is licensed (BLTTL-19961025JC) as a "secondary" TV translator station on channel 14. However, the CDBS also shows that WYPN-CA has a construction permit (BPTTL-JG0601QD) to change from channel 14 to channel 43. In addition WYPN-CA is licensed (BLTTA-20011206ADN) as a Class A station on channel 43. Thus as the licensed WYPN-CA Class A application on channel 43 is 12 channels "above" the proposed channel 29 operation there is not an interference issue.<sup>3</sup>

WMVJ-LP, Melbourne, FL

Class A station WMVJ-LP is licensed (BLTTL-20010711ACI) for operation on channel 29 at Melbourne, Florida. The application for construction permit for WMVJ-LP's operation on channel 29, FCC File No. BPTTL-20001006ABD, was filed almost 3 months "after" the GCA proposal for channel 29 at Gainesville. In other words, at

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<sup>3</sup> This was also noted in the original GCA Petition on Figure 4 of the Technical Exhibit at footnote 1.

the time the channel 29 petition was prepared, the WMVJ-LP Class A facility did not exist, therefore making it impossible to protect. However, it has been determined that based on the modified channel 29 facilities proposed herein, prohibited contour overlap with WMVJ-LP would be eliminated.

WRCF-LP, Orlando, FL

Class A station WRCF-LP is licensed (BLTTL-20001020AAD) for operation on channel 29 at Orlando, Florida. Based on the modified channel 29 facilities proposed herein, it is believed the necessary protection will be provided.

WBXG-LP, Gainesville, FL

In the FCC's dismissal letter, it was noted that the proposed channel 29 operation was short-spaced to proposed Class A station WBXG-LP at Gainesville, Florida. According to the FCC's CDBS, WBXG-LP is licensed for operation on channel 31 (BLTTL-19900328JF), has a pending application (BPTTL-20010710AAL) for operation on channel 33 and also has a pending application for Class A status on channel 33 (BLTTA-20010226AAL). It appears WBXG-LP filed for channel 33, as a result of being displaced by the DTV allotment of station WOGX at Ocala, Florida. Therefore, only the channel 33 facility would need to be protected. However, WBXG-LP proposes to operate on channel 33 with a maximum directional ERP of 26 kilowatts. In accordance with Section 73.613(d) of the Commission's rules, a UHF TV broadcast station application will not be accepted if it specifies a site less than 32 kilometers from the transmitter site of a UHF Class A TV station that is authorized an ERP of more than 50 kilowatts and operating on a channel which is the second, third, or fourth channel

above or below the requested channel. Since WBXG-LP is proposing only a 26 kilowatt facility, the separation distance of 32 kilometers is not applicable, and therefore it is believed Class A station WBXG-LP is not an interference consideration.

Proposed NTSC Channel 29 Facilities

NTSC channel 29 can be substituted and allotted to Gainesville, Florida in compliance with the principle community coverage requirements of section 73.685(a) at the following reference coordinates, Latitude 29° 37' 47", Longitude 82° 34' 24". Operation on channel 29 from the proposed site appears permissible with a maximum directional effective radiated power (ERP) of 3600 kilowatts and an HAAT of 278 meters.

The proposed transmitter site would meet the Commission's minimum separation requirements applicable to NTSC operation on channel 29 specified in Section 73.610. analog (NTSC) allotments. The proposed channel 29 operation complies with the FCC's interference criterion with respect to DTV allotments and authorized DTV facilities provided in Section 73.623(c). Furthermore, it is believed that the proposed channel 29 operation also complies with the FCC's interference criteria applicable to Class A facilities set forth in Section 73.613. Therefore, it is proposed to modify the Channel 61 NTSC allotment at Gainesville with the following specifications:

State & City	NTSC Channel	NTSC ERP(kW)	Antenna HAAT(m)
FL, Gainesville	29	3600	278

It is proposed to amend the NTSC Table of Allotments, Section 73.606(b) of the Commission's Rules, as follows:

<u>City</u>	<u>Channel No.</u>	
	<u>Present</u>	<u>Proposed</u>
Gainesville, Florida	5, 20, 61	5, 20, 29

It is proposed to allot UHF channel 29 at Latitude 29° 37' 47", Longitude 82° 34' 24". The channel 29 facility proposes operation with an antenna radiation center height above mean sea level (RCAMSL) of 305 meters, an antenna radiation center height above average terrain of 278 meters, and a maximum directional antenna ERP of 3600 kilowatts.

Figure 1 is a separation study toward other NTSC and DTV allotments based on a 161 kilometer "buffer". As indicated, the allotment reference point is fully-spaced to all other NTSC stations or allotments except toward a vacant domestic noncommercial NTSC channel 29 allotment at Ocala, Florida. The domestic noncommercial NTSC channel 29 allotment at Ocala is considered to be "deleted" pursuant to paragraph 112 of the 6<sup>th</sup> Report and Order in MM Docket No. 87-268 (FCC 97-115). With respect to DTV allotments, the separation requirements can be used as an indication of which stations have the potential of receiving interference from the proposed channel 29 NTSC operation.

Figure 2 is a graph and tabulation of the proposed directional antenna pattern. The proposed directional antenna pattern complies with the 15 dB maximum-to-minimum ratio specified in Section 73.685(e). Also shown on Figure 2 is the original orientation of the pattern.

Figure 3 provides a summary of DTV interference and service for the proposed channel 29 NTSC allotment. Determination of DTV interference was made in accordance

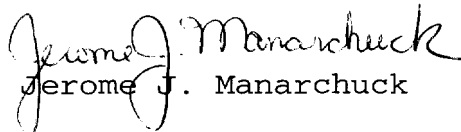
with the procedures adopted in the FCC's Second Memorandum Opinion and Order on Reconsideration of the Fifth and Sixth Report and Orders in MM Docket No. 87-268 and outlined in OET Bulletin No. 69. Studies indicate that the proposed channel 29 operation would not cause prohibited interference to any DTV allotments, and therefore the proposed operation is in full compliance with the FCC's interference criterion with respect to pertinent DTV allotments.

Figure 4 is a map which depicts the City Grade (80 dBu), Grade A (74 dBu), and Grade B (64 dBu) contours for the proposed channel 29 NTSC operation. The city limits of Gainesville based on the 2000 Census data, are also shown. As indicated, all of Gainesville is located within the predicted City Grade contour. Therefore, the proposed channel 29 NTSC allotment will comply with the FCC's city coverage requirements.

Figure 5 is a tabulation of all co-channel and adjacent channel Class A stations which could potentially be adversely impacted by the proposed channel 29 NTSC operation. As indicated on Figure 5, it is believed that the proposed operation on NTSC channel 29 at Gainesville will not adversely impact any of the tabulated co-channel or pertinent adjacent channel Class A stations.

Conclusion

Channel 29 can be substituted for the current channel 61 NTSC allotment at Gainesville, in compliance with the FCC rules concerning NTSC allotment changes.

  
Jerome J. Manarchuck

du Treil, Lundin & Rackley, Inc.  
201 Fletcher Avenue  
Sarasota, Florida 34237

November 28, 2001

TV - TV Separation Study

Job Title :CH 29 GAINESVILLE  
Zone : 3  
Channel 29 (560-566 MHz)

Separation Buffer 161 km  
FCC TV DB Date : 11/20/01  
Coordinates : 29-37-47 82-34-24

Call Status	City St	FCC File No.	Channel Zone	ERP(kW) HAAT(m)	Latitude Longitude	Bear. True	Dist. (km)	Req. (km)
WABW-T LIC	PELHAM GA BLET	-19881018	*14(-) III	5000 378	31-08-05 84-06-16	319.1	222.48 102.58	119.9 CLEAR
WCEU LIC	NEW SMYRNA BEACH FL BLCT	-19880129	*15(+) III	708 176	29-10-24 81-09-24	109.9	146.52 50.82	95.7 CLEAR
WBSG-T APP	BRUNSWICK GA BPCT	-20010629	21(+) III	5000 598	30-49-17 81-44-13	31.0	154.71 123.31	31.4 CLEAR
WBSG-T LIC	BRUNSWICK GA BLCT	-19900412	21(+) III	2630 311	31-08-22 81-56-15	19.8	178.18 146.78	31.4 CLEAR
WBSG-T CP	BRUNSWICK GA BPCT	-19960206	21(+) III	5000 600	31-08-22 81-56-15	19.8	178.18 146.78	31.4 CLEAR
WCLF LIC	CLEARWATER FL BLCT	-20000124	22(o) III	5000 409	27-49-10 82-15-39	171.3	202.95 107.25	95.7 CLEAR
WMFE-T LIC	ORLANDO FL BLET	-396	*24(-) III	1350 381	28-36-08 81-05-37	128.1	183.62 152.22	31.4 CLEAR
WMFE-T CP	ORLANDO FL BPET	-20010615	*24(-) III	1350 380	28-36-08 81-05-37	128.1	183.62 152.22	31.4 CLEAR
WJXX LIC	ORANGE PARK FL BLCT	-19971016	25(-) III	5000 201	30-04-27 81-48-23	56.1	89.00 57.60	31.4 CLEAR
WNTD CP	DAYTONA BEACH FL BPCT	-19960709	26(o) III	5000 304	29-17-10 81-29-37	109.8	111.46 80.06	31.4 CLEAR
WNTD LIC	DAYTONA BEACH FL BLCT	-19881026	26(o) III	2750 304	29-17-10 81-29-37	109.8	111.46 80.06	31.4 CLEAR
WTXL-T LIC	TALLAHASSEE FL BLCT	-19860822	27(+) III	1170 262	30-34-27 84-12-09	304.2	188.74 157.34	31.4 CLEAR
WFTS-T CP	TAMPA FL BPCT	-19960702	28(o) III	3980 471	27-50-32 82-15-46	171.3	200.42 112.72	87.7 CLEAR
WFTS-T LIC	TAMPA FL BLCT	-19880303	28(o) III	2630 471	27-50-32 82-15-46	171.3	200.42 112.72	87.7 CLEAR

TV - TV Separation Study

Job Title :CH 29 GAINESVILLE  
Zone : 3  
Channel 29 (560-566 MHz)

Separation Buffer 161 km  
FCC TV DB Date : 11/20/01  
Coordinates : 29-37-47 82-34-24

Call Status	City St	FCC File No.	Channel Zone	ERP(kW) HAAT(m)	Latitude Longitude	Bear. True	Dist. (km)	Req. (km)
NEW	GAINESVILLE		29(o)	5000 DA	29-37-47	0.0	0.00	
ADD	FL BPRM	-20000717	III	278	82-34-24			
ALLOC.	OCALA	-	*29(o)	.000	29-11-06	139.2	65.12	329.0
	FL		III	0	82-08-06		-263.88	SHORT
WDCO-T	COCHRAN		*29(+)	5000 DA	32-28-11	348.6	321.52	280.8
LIC	GA BLET	-19900608	II	350	83-15-17		40.72	CLEAR
WFLX	WEST PALM BEACH		29(+)	5000 DA	26-34-37	145.5	408.56	329.0
CP	FL BPCT	-19990910	III	458	80-14-32		79.56	CLEAR
WFLX	WEST PALM BEACH		29(+)	5000 DA	26-34-37	145.5	408.56	329.0
LIC	FL BLCT	-19860514	III	457	80-14-32		79.56	CLEAR
WAWS	JACKSONVILLE		30(+)	5000 DA	30-16-53	52.9	120.77	87.7
CP	FL BPCT	-19960711	III	304	81-34-15		33.07	CLEAR
WAWS	JACKSONVILLE		30(+)	2820	30-16-53	52.9	120.77	87.7
LIC	FL BLCT	-19810210	III	302	81-34-15		33.07	CLEAR
WBCC	COCOA		*30	182 DA	28-36-35	127.3	185.71	87.7
CP	FL BPEDT	-20000427	III	491	81-03-35		98.01	CLEAR
ALLOC.	VALDOSTA	-	*33(o)	.000	30-49-54	333.3	149.54	31.4
	GA		III	0	83-16-42		118.14	CLEAR
ALLOC.	MADISON	-	36(-)	.000	30-28-05	319.3	123.20	95.7
	FL		III	0	83-24-43		27.50	CLEAR
WBSF	MELBOURNE		43(+)	2290 DA	28-18-22	131.9	218.47	95.7
LIC	FL BLCT	-19980422	III	303	80-54-45		122.77	CLEAR
WGVP	VALDOSTA		44(-)	1700 DA	31-10-18	336.3	187.14	119.9
LIC	GA BLCT	-19951107	III	277	83-21-57		67.24	CLEAR
WTOG	ST. PETERSBURG		44(+)	5000	27-49-46	171.4	201.77	119.9
LIC	FL BLCT	-19990415	III	454	82-15-59		81.87	CLEAR

\*\* End of TV Separation Study for Channel 29 \*\*



TV - DTV Separation Study

Job Title :CH 29 GAINESVILLE

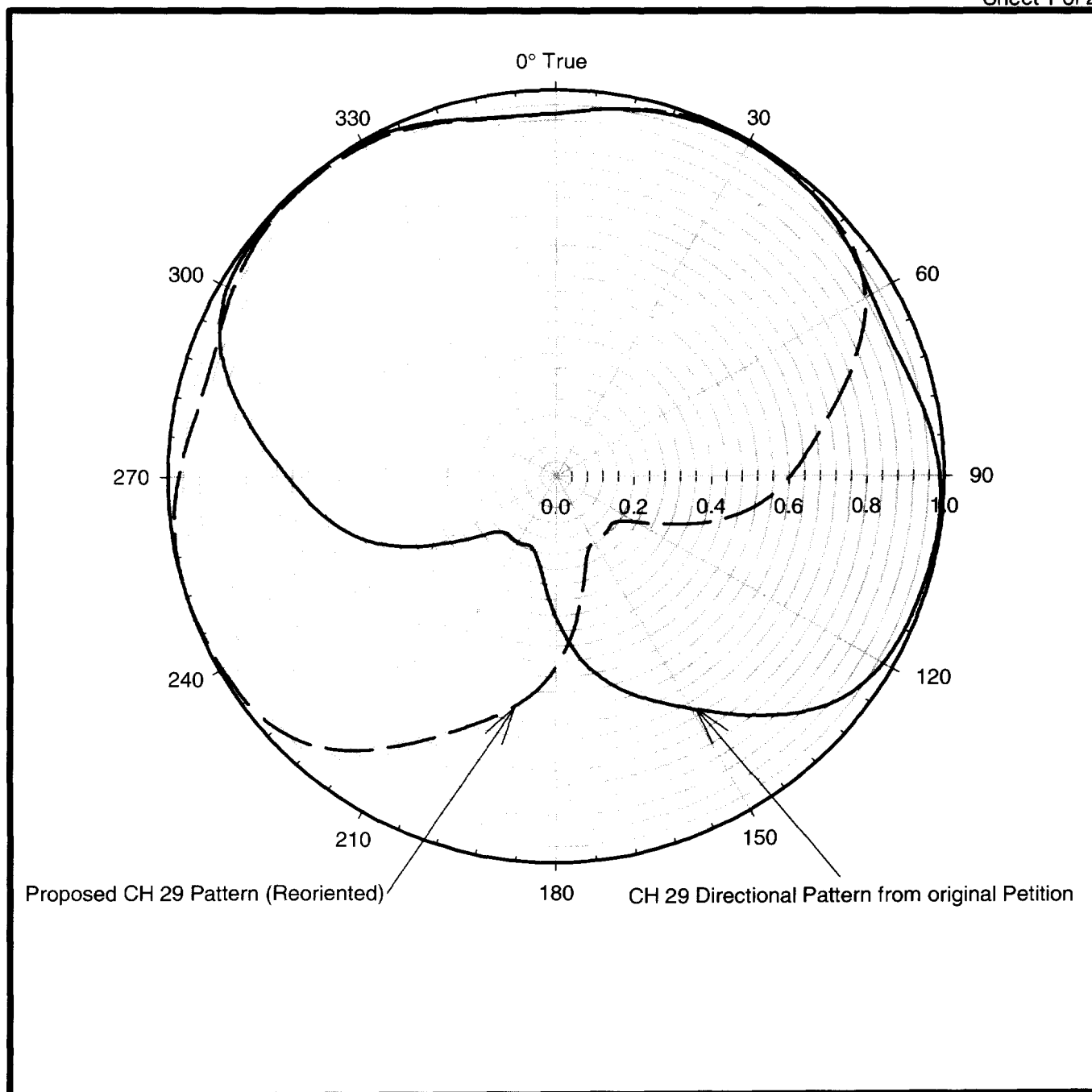
Separation Buffer 161 km

Zone : 3

Channel 29 (560-566 MHz)

Coordinates : 29-37-47 82-34-24

Call	City	Channel	ERP(kW)	Latitude	Bear.	Dist.	Req.
Status	St	FCC File No.	Zone	HAAT(m)	Longitude	True (km)	(km)
WGFL-D	HIGH SPRINGS	28	625	29-37-46	220.1	0.05	12.0/106.0
CP	FL BPCDT -19980910	III	259	82-34-25		11.55	CLOSE
DWGFL	HIGH SPRINGS	28	103.9	29-37-47	0.0	0.00	12.0/106.0
DTVALT	FL	III	278	82-34-24		12.00	CLOSE
WFTS-D	TAMPA	29	500	27-50-32	171.3	200.43	244.6
CP MOD	FL BMPCDT-19991230	III	476	82-15-45		-44.17	SHORT
DWFTS	TAMPA	29	101	27-50-32	171.3	200.41	244.6
DTVALT	FL	III	471	82-15-46		-44.19	SHORT
WPGX	PANAMA CITY	29	1000 DA	30-23-42	287.4	297.96	244.6
CP	FL BPCDT -20000426	III	225	85-32-02		53.36	CLEAR
DWPGX	PANAMA CITY	29	50	30-23-42	287.4	297.95	244.6
DTVALT	FL	III	228	85-32-02		53.35	CLEAR
DWBCC	COCOA	30	50	28-18-26	131.9	218.32	12.0/106.0
DTVALT	FL	III	287	80-54-48		112.32	CLEAR
DWFXL	ALBANY	30	50	31-19-52	327.2	225.57	12.0/106.0
DTVALT	GA	III	302	83-51-43		119.57	CLEAR



## HORIZONTAL PLANE RELATIVE FIELD PATTERNS

NEW TV STATION  
GAINESVILLE, FLORIDA  
CH 29 3600 KW (MAX-DA) 278 M

du Treil, Lundin & Rackley, Inc. Sarasota, Florida

TECHNICAL EXHIBIT  
PREPARED IN SUPPORT OF A  
PETITION FOR RECONSIDERATION TO  
MODIFY THE NTSC ALLOTMENT TABLE  
CHANNEL 29  
GAINESVILLE, FLORIDA

Tabulation of Horizontal Relative Fields

Azimuth (deg. True)	Relative Field	Azimuth (deg. True)	Relative Field
0	0.935	180	0.495
10	0.963	190	0.602
20	0.989	200	0.691
30	0.994	210	0.803
40	0.987	220	0.917
50	0.974	230	0.979
60	0.921	240	0.993
70	0.811	250	0.999
80	0.695	260	0.996
90	0.604	270	0.972
100	0.504	280	0.941
110	0.363	290	0.937
120	0.235	300	0.963
130	0.190	310	0.985
140	0.195	320	0.992
150	0.193	330	0.987
160	0.228	340	0.966
170	0.348	350	0.938

Extra Bearing(s)			
255	1.000		

TECHNICAL EXHIBIT  
 PREPARED IN SUPPORT OF A  
 PETITION FOR RECONSIDERATION TO  
 MODIFY THE NTSC ALLOTMENT TABLE  
 CHANNEL 29  
 GAINESVILLE, FLORIDA

Interference and Service Summary

I. Interference Caused

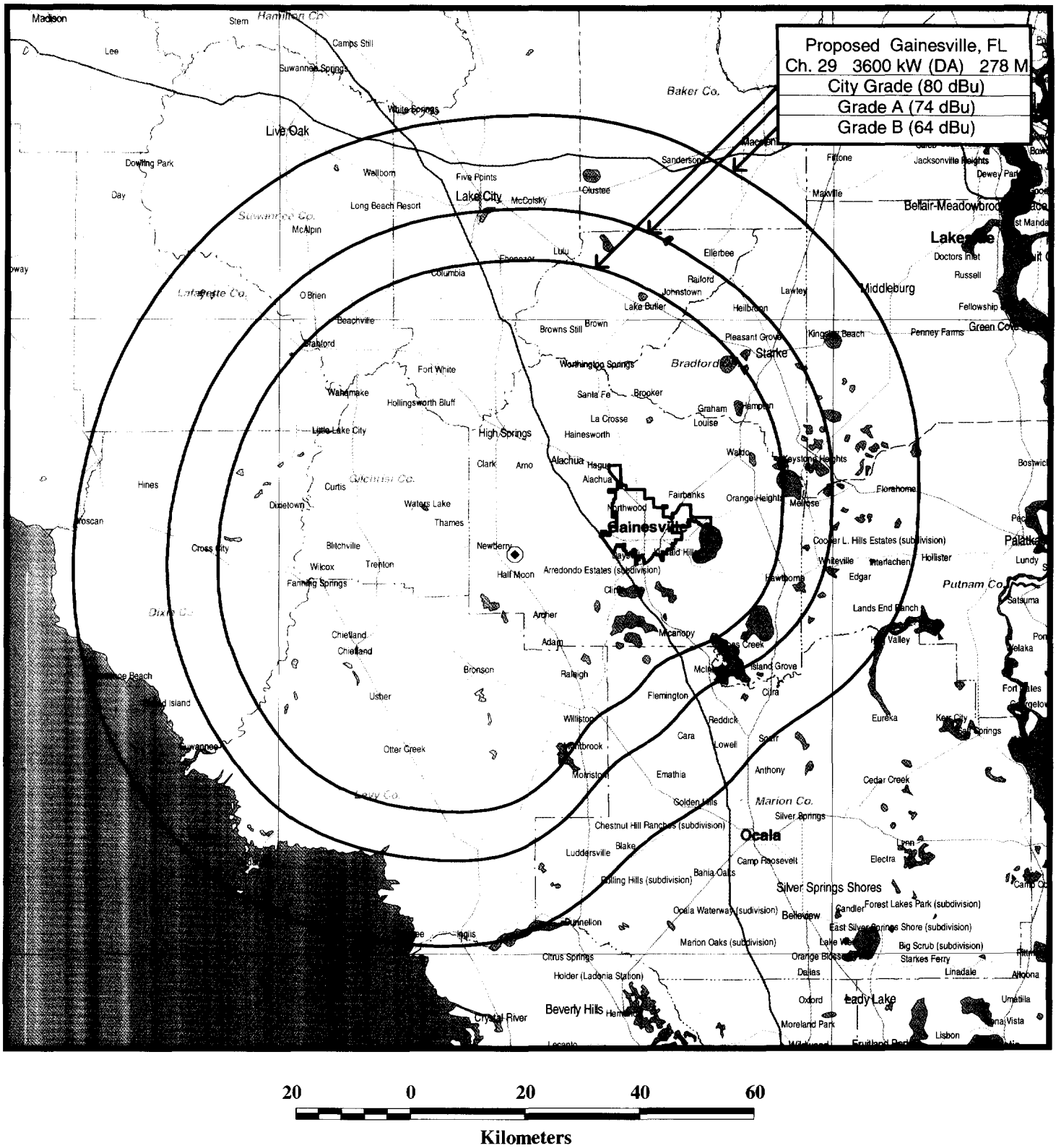
Protected DTV Station	FCC Service Population	Unique Interference Population*
WGFL-DT, DTV Ch. 28 High Springs, FL CP DTV Allotment	No Interference Calculated No Interference Calculated	
WPGX-DT, DTV Ch. 29 Panama City, FL CP DTV Allotment	No Interference Calculated No Interference Calculated	
WFTS-DT, DTV Ch. 29 Tampa, FL CP MOD DTV Allotment	3,078,997 3,078,997	10,140 (0.3%) 1,265 (0.0)
WBCC-DT, DTV Ch. 30 Cocoa, FL CP DTV Allotment	No Interference Calculated No Interference Calculated	
WFXL-DT, DTV Ch. 30 Albany, GA DTV Allotment	No Interference Calculated	

\*Considers interference "masking" from other NTSC and DTV assignments.

II. Service

	2000 U.S. Population Within
Grade B Contour	467,174

Figure 4



## PREDICTED COVERAGE CONTOURS

NEW TV STATION  
 GAINESVILLE, FLORIDA  
 CH 29 3600 KW (MAX-DA) 278 M

du Treil, Lundin & Rackley, Inc. Sarasota, Florida

Potentially Impacted Class A LPTV Stations

Call Status	City State	FCC File No.	Channel Zone	ERP(kw) HAAT(m)	Latitude Longitude	Bearing deg-True	Distance (km) (mile)
WJXE-L LIC	GAINESVILLE FL	BLTTL -19961025	14(+)	16 DA 164 max.	29-44-22 82-23-09	55.99	21.85 13.58 <sup>1</sup>
WRCF-L LIC	ORLANDO FL	BLTTL-20001020AAD	29(-) III	5 DA 142 max.	28-32-25 81-22-46	135.95	167.60 104.17 <sup>2</sup>
WMVJ-L LIC	MELBOURNE FL	BLTTL-20010711ACI	29(Z) III	50 DA 156 max	28-08-15 80-42-11	131.90	246.35 153.07 <sup>2</sup>
WBXG-L LIC	GAINESVILLE FL	BLTTL -19900328	31(+) III	25.5 121 max.	29-38-36 82-25-09	84.16	15.00 9.33 <sup>3</sup>
WBXG-L APP	GAINESVILLE FL	BPTTL-20010710AAL	33(+) III	23.6 118 max	29-28-37 82-25-11	84.02	14.95 9.29 <sup>3</sup>
W33BL LIC	CHIEFLAND FL	BLTTL -19960415	33 III	22.7 DA 59 max.	29-28-12 82-48-20	231.73	28.64 17.80 <sup>3</sup>

<sup>1</sup> WJXE-LP has a construction permit (BPTTL-JG0601QD) to change from channel 14 to channel 43 which will eliminate any potential for adverse impact.

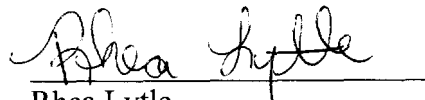
<sup>2</sup> No adverse impact based on contour overlap protection method.

<sup>3</sup> This Class A station does not propose operation with an ERP greater than 50 kilowatts and therefore was not considered, in accordance with Section 73.613(d) of the FCC rules.

**CERTIFICATE OF SERVICE**

I, Rhea Lytle, a secretary in the law firm of Shaw Pittman, hereby certify that on this 29th day of November, 2001, I caused to be served by hand delivery a copy of the foregoing **“Petition for Reconsideration”** on the following:

John A. Karousos, Chief  
Allocations Branch  
Policy and Rules Division  
Mass Media Bureau  
Federal Communications Commission  
445 12th Street, S.W.  
Room 3-A266  
Washington, D.C. 20554

  
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Rhea Lytle